



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street, 3rd floor  
New York, New York 10007*

June 12, 2025

**BY ECF**

The Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: *State of New York et al. v. U.S. Department of Education et al.*,  
No. 25 Civ. 2990 (ER)

Dear Judge Ramos:

This Office represents defendants in the above-referenced matter. We write respectfully to request a 26-day extension of time, from June 13, 2025, to July 9, 2025, to respond to the Complaint. The reason for this request is that the Government has appealed the Court's June 3 Preliminary Injunction Order, and has moved in the Second Circuit for a stay of that Order pending resolution of the appeal. The Second Circuit has set an expedited briefing schedule for the Government's motion to stay, and has placed the motion on the Court's June 17, 2025 calendar. Because the Circuit's ruling on the Government's motion may well affect the Government's response to the Complaint and, more generally, how the parties wish to proceed, we believe it would be most efficient to delay the Government's time to respond to the Complaint until after the Circuit has issued a decision on the Government's motion to stay.

In addition, we are requesting additional time to respond to the Complaint because I will be traveling internationally to visit family from June 19 to July 5. We thus respectfully request that our response be due the week after I return. This is the Government's first request for an extension of time regarding its response to the Complaint. Plaintiffs consent to this request.

We thank the Court for its consideration of this request.

Respectfully submitted,

JAY CLAYTON  
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Southern District of New York

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cc: *Plaintiffs' counsel* (by ECF)